

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 0:24-cv-60312-AHS

DVASH AVIATION HOLDINGS, LLC,

Plaintiff,

v.

AMP LEASING LIMITED, and  
SIDERAL LINHAS AEREAS LTDA,

Defendants.

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**UNOPPOSED DEFENDANTS' MOTION FOR EXTENSION  
OF TIME TO RESPOND TO PLAINTIFFS' COMPLAINT**

The Defendants AMP LEASING LIMITED (“AMP Leasing”) and SIDERAL LINHAS AEREAS LTDA. (“Sideral”) (collectively, the “Defendants”), by and through their undersigned counsel, submit this unopposed motion pursuant to Rule 6(b) of the Federal Rules of Civil Procedure for an extension of time through Friday, May 31, 2024 for the Defendants to respond to the Complaint [DE 1] (the “Unopposed Motion”). For the reasons set forth below, the Unopposed Motion should be granted.

1. On or about February 25, 2024, the Complaint for breach of contract and unjust enrichment was filed with the Court.
2. The Defendants engaged undersigned counsel to represent them in connection with this action.
3. Counsel for the Plaintiff advised undersigned counsel that the Complaint was served on the Defendants through the Florida Secretary of State, however counsel for the Defendants has not yet verified that information, nor do the Defendants admit that such service

would be proper under the circumstances.

4. Undersigned counsel must review and analyze the allegations contained in the Complaint, as well as review relevant documents, and speak with the clients to discuss the allegations contained in the Complaint for purposes of preparing a response to the Complaint, including, but not limited to, the possibility of serving a motion directed to the sufficiency of the allegations contained in the Complaint as well as any defenses relating to service of process and jurisdiction over the Defendants.

5. In order to do such a review of the factual and legal basis for the claims asserted in the Complaint and potential defenses, undersigned counsel for the Defendants requires an extension of time through Friday, May 31, 2024.

6. Undersigned counsel for the Defendants contacted counsel for the Plaintiff regarding the relief requested in this Unopposed Motion and represents to the Court that counsel for the Plaintiff has no objection to the extension of time requested in this Unopposed Motion.

WHEREFORE, the Defendants AMP Leasing and Sideral respectfully request that this Court grant the Unopposed Motion and extend the time for the Defendants to respond to the Complaint through Friday, May 31, 2024, together with granting such other and further relief as to this Court appears just and proper.

Respectfully submitted,

/s/ Seth P. Robert

Seth P. Robert

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*Attorneys for Defendants AMP Leasing Limited and  
Sideral Linhas Aereas Ltda.*

**Certificate of Service**

I hereby certify that on April 29, 2024 I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which served a copy of the foregoing upon the following:

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